

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: March 25, 2008
v.	:	CRIMINAL NO. _____
MYCHAEL SAUNDERS	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (conspiracy to
	:	interfere with interstate commerce by
	:	robbery - 1 count)
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery
	:	- 1 count)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during a crime of violence
	:	- 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. C & C Sports Center located at 101 Geiger Road in Philadelphia, Pennsylvania, was engaged in interstate commerce.
2. From in about November, 2005 through in about January, 2006, in the Eastern District of Pennsylvania, defendant

MYCHAEL SAUNDERS

conspired and agreed, together with others known and unknown to the grand jury, to commit a series of robberies which would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendant SAUNDERS conspired to

unlawfully take and obtain money and firearms from various businesses, including C & C Sports Center on or about November 25, 2005, in the presence of the owners, customers, and/or employees of those businesses, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, in violation of Title 18, United States Code, Section 1951(a).

MANNER AND MEANS

3. It was part of this conspiracy that defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury went to various businesses in Philadelphia, Pennsylvania and the surrounding area, entered the stores, held those inside the stores at gunpoint, threatened them with bodily injury if they did not cooperate, and stole money and other items from the stores.

OVERT ACTS

In furtherance of the conspiracy, in the Eastern District of Pennsylvania, defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about November 25, 2005:

1. Defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury planned to rob a gun store and acquired one or more handguns for that purpose.
2. Defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury went together in a borrowed car to C & C Sports Center located at 101 Geiger Road in Philadelphia, Pennsylvania.
3. Defendant MYCHAEL SAUNDERS and persons known and unknown to the

grand jury barged into the store and held the owner and customers at gunpoint, while threatening to kill them if they did not cooperate.

4. Defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury money stole money from the store's register and from the owner's person.

5. Defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury smashed the glass display cases in the store and stole firearms, firearm clips, and ammunition from the store.

6. Defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury then fled from the store and escaped in the borrowed car.

7. Following the robbery, defendant MYCHAEL SAUNDERS and persons known and unknown to the grand jury gathered together to divide the proceeds from the robbery among themselves and others known and unknown to the grand jury.

8. After dividing the proceeds from the robbery, persons known to the grand jury stored guns and ammunition that were stolen during the robbery in a house in Philadelphia known to the grand jury.

9. Persons known to the grand jury sold and attempted to sell some of the guns and ammunition that were stolen during the robbery of C & C Sports Center to others.

10. Persons known to the grand jury used some of the guns and ammunition that were stolen during the robbery of C & C Sports Center to commit other robberies.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3, and Overt Acts 1 through 10 of Count One of this indictment are incorporated here.

2. On or about November 25, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

MYCHAEL SAUNDERS

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant SAUNDERS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money, firearms, and ammunition, from C & C Sports Center located at 101 Geiger Road in Philadelphia, Pennsylvania, in the presence of the owner and customers of C & C Sports Center and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the owner and customers of C & C Sports Center, by pointing a firearm at, demanding money from, and otherwise threatening them.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On or about November 25, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

MYCHAEL SAUNDERS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and
in relation to a crime of violence for which he may be prosecuted in a Court of the United States,
that is, conspiracy to interfere with commerce by robbery, and interference with commerce by
robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

_____ **A TRUE BILL:**

_____ **GRAND JURY FOREPERSON**

PATRICK L. MEEHAN
UNITED STATES ATTORNEY_____